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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND  
[PROPOSED] ORDER EXTENDING  
DISCOVERY, CLASS CERTIFICATION  
BRIEFING SCHEDULE, AND  
HEARING DATE**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17<sup>th</sup> Floor

STIPULATION EXTENDING DISCOVERY, CLASS CERTIFICATION BRIEFING SCHEDULE, AND  
HEARING DATE

Case No. 3:20-CV-04688-RS

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively referred to as the “Parties,” hereby enter into this joint stipulation.

WHEREAS, on November 22, 2021, the Court granted plaintiffs’ Motion for Relief from Case Management Schedule, extending the deadlines for the close of fact discovery, initial expert witness disclosures, rebuttal expert witness disclosures, and the close of expert discovery (Dkt. 180), and

WHEREAS, on February 1, 2022, the parties stipulated to a new class certification briefing schedule and hearing date consistent with the Court’s November 22, 2021 order (Dkt. 214), which the Court entered on February 1, 2022 (Dkt. 215), and

WHEREAS, on May 20, 2022 (Dkt. 243), the parties stipulated to an extension of all discovery deadlines and the class certification briefing and hearing schedule to allow the parties to complete ordered and pursued discovery, and

WHEREAS, Google has represented that it substantially completed document production for the Court-ordered and agreed upon search terms on July 28, 2022;

WHEREAS, the close of fact discovery is currently scheduled for September 26, 2022, and

WHEREAS, the parties have agreed to an extension of the fact discovery cutoff to allow additional time to complete discovery; and

WHEREAS, the parties have also agreed to extensions for other discovery deadlines and the class certification briefing and hearing schedule;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, that the following dates and deadlines for further proceedings should apply to this case:

- Close of Fact Discovery: October 31, 2022
- Initial Expert Witness Disclosures: January 20, 2023
- Rebuttal Expert Witness Disclosures: May 1, 2023
- Close of Expert Discovery: June 2, 2023

- Motion for Class Certification: June 9, 2023
- Opposition to Motion for Class Certification: July 14, 2023
- Reply In Support of Class Certification: August 11, 2023
- Hearing on Class Certification: At the Court's discretion, but proposed for August 24, 2023 at 1:30 PM

A Proposed Order is submitted concurrently herewith.

IT IS SO STIPULATED.

DATED: August 11, 2022

WILLKIE FARR & GALLAGHER, LLP

By: /s/ Eduardo E. Santacana  
Eduardo E. Santacana

*Attorneys for Defendant Google LLC*

DATED: August 11, 2022

SUSMAN GODFREY LLP

By: /s/ Amanda Bonn  
Amanda Bonn

*Attorneys for Plaintiffs*

**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: August 11, 2022

SUSMAN GODFREY L.L.P.

/s/ Amanda Bonn  
Amanda Bonn

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**[PROPOSED] ORDER EXTENDING  
DISCOVERY, CLASS CERTIFICATION  
BRIEFING SCHEDULE, AND  
HEARING DATE**

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17<sup>th</sup> Floor

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the deadlines in this case are extended as follows:

- Close of Fact Discovery: October 31, 2022
- Initial Expert Witness Disclosures: January 20, 2023
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- Close of Expert Discovery: June 2, 2023
- Motion for Class Certification: June 9, 2023
- Opposition to Motion for Class Certification: July 14, 2023
- Reply In Support of Class Certification: August 11, 2023
- Hearing on Class Certification: [At the Court's discretion, but proposed for August 24, 2023 at 1:30 PM]

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Richard Seeborg